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LIST LTR ENC

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RNIVAL, G.J.		
PP, R.D.		
RDONA, R.C.		
VIS, J.G.		
RRERA, D.W.		
ANZ, W.A.		
NNI, B.J.		
ALY, T.J.		
DAHL, T.G.		
BIG, J.G.		
ITCHINS, N.M.	<input checked="" type="checkbox"/>	
BY, W.A.		
JESTER, A.W.		
HAFFEY, J.W.		
NN, H.P.		
ARX, G.E.		
KENNA, F.G.		
ORGAN, R.V.		
ZZUTO, V.M.		
OTTER, G.L.		
ANDLIN, N.B.		
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ETLOCK, G.H.		
LIVAN, M.T.		
VANSON, E.R.		
ILKINSON, R.B.		
ILSON, J.M.		

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Bisby, W.J.

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Reviewed for Addressee  
Corres Control RFP

11-8-93  
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DOE ORDER # 5400.1

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## UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION VIII

999 18th STREET - SUITE 500  
DENVER, COLORADO 80202-2466

Nov 8 8 11 AM '93

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ROCKY FLATS PLANT  
EG&G  
CORRESPONDENCE CONTROL

Mr. Richard Schassburger  
Rocky Flats Office  
U.S. Department of Energy  
P.O. Box 928  
Golden, Colorado 80402-0928

Subject: Technical Review Comments on Rocky Flats Plant  
Draft Standard Operating Procedure (SOP)  
GT.08, Revision 0, Draft A  
Surface Soil Sampling

Dear Mr. Schassburger:

EPA has reviewed the revised Surface Soil Sampling SOP; GT.08, Rev. 0, Draft A, which was received on October 26, 1993. The revisions made to this document have adequately addressed our previous comments and concerns. However in addition to addressing our concerns, unnecessary additions were made in sections 4.2.3 and 4.3.3, which state that "permission and clearance for collecting samples will need to be coordinated with the appropriate EG&G department". In attending a meeting where surface soil sampling was discussed, it was learned that EG&G requires "soil disturbance permits" for all soil sampling done at Rocky Flats Plant and that approximately two weeks or more is needed for issuance of such permits.

This requirement seems to be unnecessary, especially for surface soil sampling where minimal disturbance occurs. In addition, this sort of requirement slows down the process and increases costs. Unless it can be shown that soil disturbance permits are necessary and important, this requirement must be eliminated and the above mentioned reference to the process removed from this document. In the meantime, EPA grants conditional approval of the above referenced document, contingent upon your response regarding elimination of soil disturbance permits.

If you have any questions or comments regarding this matter, please contact Gary Kleeman of my staff at 294-1071.

Sincerely,

Martin Hestmark, Manager  
Rocky Flats Project

cc: Bruce Thatcher, DOE  
Mike McHugh, EG&G.

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